

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,  
HARPERCOLLINS PUBLISHERS LLC,  
JOHN WILEY & SONS, INC., and  
PENGUIN RANDOM HOUSE LLC

Plaintiffs,

v.

INTERNET ARCHIVE and DOES 1 through  
5, inclusive

Defendants.

Case No. 1:20-CV-04160-JGK

**[PROPOSED] REVISED SCHEDULING ORDER**

After reviewing the Joint Letter dated January 14, 2022 and for good cause shown, the Court hereby orders that the following schedule will govern this civil action:

Deadline to complete fact depositions (close of fact discovery).	January 31, 2022
Deadline to complete expert reports on issues on which each party bears the burden of proof (the "Opening Reports").	February 25, 2022
Deadline to complete expert reports on issues on which each party does not bear the burden of proof, but not limited to responding to the opening reports (the "Rebuttal Reports"). Any response to the Opening Reports must be contained in the Rebuttal Reports, however.	April 29, 2022
Deadline to serve reply reports to the Rebuttal Reports. Reply reports are limited to responding to the Rebuttal Reports.	May 27, 2022
End of all discovery, including expert depositions.	June 10, 2022
Deadline for dispositive motions.	July 7, 2022
Filings in opposition to dispositive motions due.	September 2, 2022

Reply filings in further support of dispositive motions due.	October 7, 2022
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**SO ORDERED.**

Dated: \_\_\_\_\_, 2022

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Honorable Ona T. Wang  
United States Magistrate Judge